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June 13, 2022

Via ECF

Hon. Leslie G. Foschio, U.S.M.J.
United States District Court
Western District of New York
2 Niagara Square – 7th Floor
Buffalo, New York 14202

Dear Judge Foschio:

Re: *Epps v. Detective Mark Stambach*
Case No. 19-cv-00281V(F)

As you know, we represent Defendants in the above-captioned matter. We write to respectfully request an additional extension of time to complete expert disclosures. On April 4, 2022, Plaintiff's counsel completed their expert disclosures. Our office is still in the process of having of retaining experts and having them create their expert reports. Over the past few weeks, Mr. Russ and I have been incredibly busy with post-verdict briefing in one matter and depositions in another matter. Both of these matters are pending in the Western District of New York. Given the time we have had to allot to these matters, and given both of our case-loads, we require further additional time to disclose our experts in this matter, and would greatly appreciate any accommodation the Court is willing to extend in that regard.

We are respectfully requesting a thirty day extension of time for Defendants to serve expert disclosures in this matter. This would make our deadline to disclose experts August 12, 2022. Further, if these changes are granted, we would request that the deadline to file dispositive motions and the deadline to complete mediation be extended by thirty days as well. This would extend those deadlines to September 16, 2022 and October 3, 2022, respectively.

This is our office's second extension request with respect to expert discovery. We have consulted with Plaintiff's counsel, and they have notified us that they consent to our request. We thank counsel for their courtesies. We also thank the Court in advance for its consideration, and assure the Court that there will be no further delays in completing expert discovery.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Peter Sahasrabudhe'.

Peter Sahasrabudhe

Copy to: Hugh M. Russ
Rob Rickner, Esq.
Glenn A. Garber, Esq.